Exhibit E

STATE OF MINNESOTA DISTRICT COURT

COUNTY OF HENNEPIN FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

DOROTHY ALLEN, JUDITH ALLEN, LORETTA ANDREWS, JANET ARBOGAST, KAREN AWALD, CAROL BANNERMAN, PHYLLIS BARNES, JOANNE BARRETT, BETTY BETHEA, JOANNE BLACK, MARY BOWDEN, HAZEL BURGESS, JOYCE BURPEE, VIRGINIA CAMPBELL, ADRIANNE CARRERA, LOIS CARTER, MARGARET CHAMNESS, MARY CHRISCO, PEGGY CLEMONS, SALLY COLLINS, BARBARA COUCH, MARY DAWSON, LOIS DUFFY, LINDA EELLS, RACHEL EPSTEIN, FRANCES FARR, MARJORIE FLAMAN, MARGARET FOLTZ, WANDA FOLTZ, DELOIS FOSTER, JO GARRISON O'NEIL, SHARON HAEMKER, MARGARET HARRIS, LOUISE HESS, WANDA HINCEMAN, MARGUERITE HJALMARSON, ALICE HOLTZMAN, RITA HREN, NANCY HUNTER, YVONNE HUTCHINSON, GLENDA IVEY, DORIS JEROME, GRACE KIGER, PATSY ANDERSON, JUANITA BROUWER, NATA CARGAN, NANCY JO CARTER, JAN COSTA RYDJESKE, WILMA COWART, PATRICIA FERNAU, ISABEL FRAGOSO, DORIS GIST, HELEN PENNY AROS, PATRICIA BRUNNER, JOAN CASTO, MARIAN CONNER, JANET EDWARDS, WILMA FAULKNER, NANCY KATTE, NAN MAURY;

Plaintiffs,

Court File No:

SUMMONS

vs.

WYETH and its divisions WYETH PHARMACEUTICALS, INC. and ESI LEDERLE; PFIZER INC.; PHARMACIA & UPJOHN COMPANY; PHARMACIA CORPORATION; BARR LABORATORIES, INC.; MEAD JOHNSON & COMPANY; GREENSTONE, LTD.; and DOES 1-10, inclusive,

Defendants.

THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiffs' attorneys an

Answer to the Complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

This case may be subject to Alternative Dispute Resolution (ADR) process under Rule 114 of the General Rules of Practice for the District Courts. The court administrator or your attorney can provide you with information about ADR options and a list of neutrals available in your area. ADR does not affect your obligation to respond to the Summons and Complaint within twenty (20) days.

Dated: 7/24/08

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STATE OF MINNESOTA

COUNTY OF HENNEPIN

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

DOROTHY ALLEN, JUDITH ALLEN, LORETTA ANDREWS, JANET ARBOGAST, KAREN AWALD, CAROL BANNERMAN, PHYLLIS BARNES, JOANNE BARRETT, BETTY BETHEA, JOANNE BLACK, MARY BOWDEN, HAZEL BURGESS, JOYCE BURPEE, VIRGINIA CAMPBELL, ADRIANNE CARRERA, LOIS CARTER, MARGARET CHAMNESS, MARY CHRISCO, PEGGY CLEMONS, SALLY COLLINS, BARBARA COUCH, MARY DAWSON, LOIS DUFFY, LINDA EELLS, RACHEL EPSTEIN, FRANCES FARR, MARJORIE FLAMAN, MARGARET FOLTZ, WANDA FOLTZ, DELOIS FOSTER, JO GARRISON O'NEIL, SHARON HAEMKER, MARGARET HARRIS, LOUISE HESS, WANDA HINCEMAN, MARGUERITE HJALMARSON, ALICE HOLTZMAN, RITA HREN, NANCY HUNTER, YVONNE HUTCHINSON, GLENDA IVEY, DORIS JEROME, GRACE KIGER, PATSY ANDERSON, JUANITA BROUWER, NATA CARGAN, NANCY JO CARTER, JAN COSTA RYDJESKE, WILMA COWART, PATRICIA FERNAU, ISABEL FRAGOSO, DORIS GIST, HELEN PENNY AROS, PATRICIA BRUNNER, JOAN CASTO, MARIAN CONNER, JANET EDWARDS, WILMA FAULKNER, NANCY KATTE, NAN MAURY;

Plaintiffs,

vs.

WYETH and its divisions WYETH PHARMACEUTICALS, INC. and ESI LEDERLE; PFIZER INC.; PHARMACIA & UPJOHN COMPANY; PHARMACIA CORPORATION; BARR LABORATORIES, INC.; MEAD JOHNSON & COMPANY; GREENSTONE, LTD.; and DOES 1-10, inclusive,

Defendants.

Court File No:

COMPLAINT

Plaintiffs, for their causes of action against the Defendants, and each of them, state and allege as follows:

I. PARTIES, JURISDICTION, AND VENUE

1. Plaintiffs who are non-residents of Minnesota bring this action in this Court against foreign corporation Defendants WYETH and its divisions WYETH PHARMACEUTICALS, INC. and ESI LEDERLE; PFIZER INC.; PHARMACIA & UPJOHN COMPANY; PHARMACIA CORPORATION; BARR LABORATORIES, INC.; MEAD JOHNSON & COMPANY; SOLVAY PHARMACEUTICALS; NOVARTIS PHARMACEUTICALS CORPORATION; WATSON LABORATORIES, INC.; GREENSTONE, LTD.; and DOES 1-10, inclusive, pursuant to Minnesota Statute section 303.02(6) (1990). This Court has jurisdiction over this case under section 303.02(6), because Defendants conducted business in the State of Minnesota through pharmaceutical sales representatives conducting business in the State of Minnesota on behalf of Defendants, thus there exists a sufficient nexus between the Defendants' forum contacts and the Plaintiffs' cause of action to justify assertion of jurisdiction in Minnesota.

2. Plaintiff DOROTHY ALLEN is an individual who is a citizen of Texas and resides in Watauga, TX. She developed invasive and in situ ductal breast cancer that was progesterone and estrogen hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

3. By November 17, 1989, DOROTHY ALLEN, plaintiff, was prescribed and was taking the HRT drugs Premarin and Provera.

4. On or around April 28, 1997, DOROTHY ALLEN, plaintiff, ceased taking the HRT drugs after being diagnosed with invasive and in situ ductal breast cancer.

5. Plaintiff JUDITH ALLEN is an individual who is a citizen of Ohio and resides at 6238 Dunbar Drive, Mentor, Ohio 44060. She developed invasive and in situ ductal breast

cancer that was both estrogen and progesterone hormone positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

6. In or around December 8, 1989, JUDITH ALLEN, plaintiff, was prescribed and began to take the HRT drugs Premarin and Provera.

7. In or around July 15, 1996, JUDITH ALLEN, plaintiff, switched from the HRT drugs Premarin and Provera to the single pill Prempro.

8. In or around July 1998, JUDITH ALLEN, plaintiff, ceased taken the HRT drugs and was diagnosed with invasive and in situ ductal breast cancer.

9. Plaintiff LORETTA ANDREWS is an individual who is a citizen of Arizona and resides in Sun City, AZ. She developed invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

10. By September 17, 1986, LORETTA ANDREWS, had been prescribed and was taking the HRT drugs Premarin and Provera.

11. Around June 19, 1995, LORETTA ANDREWS, plaintiff, ceased taking HRT drugs when she was diagnosed with invasive ductal breast cancer.

12. Plaintiff JANET ARBOGAST is an individual who is a citizen of Ohio and resides in Canton, OH. She developed invasive and in situ lobular breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

13. By March 28, 1990, JANET ARBOGAST, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

14. Around July 25, 1994, JANET ARBOGAST, plaintiff, was diagnosed with invasive

and in situ lobular breast cancer.

15. Plaintiff KAREN AWALD is an individual who is a citizen of Indiana and resides at 9730 E 650 N, Walkerton, Indiana 46574. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

16. By March 29, 1992, KAREN AWALD, plaintiff, had been prescribed and began to take the HRT drugs Premarin and Provera.

17. On or around July 7, 1997, KAREN AWALD, plaintiff, was switched from the two pill HRT regiment of Premarin and Provera to the single pill Prempro.

18. On or around November 1998, KAREN AWALD, plaintiff, was diagnosed with invasive ductal breast cancer. She ceased taking Prempro at that time.

19. Plaintiff CAROL BANNERMAN is an individual who is a citizen of North Carolina and resides at 6201 Coldwater Court, Raleigh, NC 27612. She developed invasive lobular breast cancer and invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Estrace, Premarin and Provera.

20. By August 19, 1987, CAROL BANNERMAN, Plaintiff, was prescribed and began to take the hormone replacement drugs Estrace and Provera.

21. By December 14, 1990, CAROL BANNERMAN, Plaintiff, was switched from Estrace to Premarin. She continued the hormone replacement therapy of Premarin and Provera.

22. In or around November 20, 1997, CAROL BANNERMAN, Plaintiff, ceased her hormone replacement therapy.

23. On June 10, 1998, CAROL BANNERMAN was diagnosed with invasive lobular

breast cancer and invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive.

24. Plaintiff PHYLLIS BARNES is an individual who is a citizen of Arkansas and resides at 1425 Forrest Road, Warren, AR 71671. She developed invasive ductal breast cancer after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

25. In or around February 16, 1987, plaintiff, was prescribed and began to take the HRT drugs Premarin and Provera.

26. On or around April 26, 1995, PHYLLIS BARNES, plaintiff, ceased taken HRT drugs after being diagnosed with invasive ductal breast cancer.

27. Plaintiff JOANNE BARRETT is an individual who is a citizen of California and resides at 2933 Sweetwood Drive, Lodi, California 95242. She developed invasive and in situ ductal breast cancer that was both estrogen and progesterone hormone positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and medroxy-progesterone acetate, ("MPA").

28. As early as 1990, but by August 28, 1996, JOANNE BARRETT was prescribed and began taking the HRT drugs Premarin and MPA.

29. Around April 22, 2002, JOANNE BARRETT, Plaintiff, ceased taking the HRT drugs.

30. In or around October 2002, JOANNE BARRETT, Plaintiff, was diagnosed with invasive and in situ ductal breast cancer that was estrogen and progesterone hormone positive.

31. Plaintiff BETTY BETHEA is an individual who is a citizen of North Carolina and resides at 317 Circle Drive, Archdale, NC 27263. She developed invasive lobular breast cancer after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

32. In the 1980s, BETTY BETHEA, plaintiff, was prescribed and began to take the HRT

drugs Premarin and Provera.

33. On or around January 1997, BETTY BETHEA, plaintiff, ceased taken HRT drugs after being diagnosed with invasive lobular breast cancer.

34. Plaintiff JOANNE BLACK is an individual who is a citizen of Washington and resides in Long Beach, WA. She developed invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

35. In 1986, JOANNE BLACK, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

36. Around March 21, 1996, JOANNE BLACK, Plaintiff, was diagnosed with Invasive Ductal Breast cancer.

37. Plaintiff MARY BOWDEN is an individual who is a citizen of New York and resides in Hammond, NY. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drug Prempro.

38. By July 1996, MARY BOWDEN, Plaintiff, was prescribed and began taking the HRT drug Prempro.

39. In October of 1999, MARY BOWDEN, plaintiff, was diagnosed with invasive ductal breast cancer.

40. Plaintiff HAZEL BURGESS is an individual who is a citizen of South Carolina and resides at 543 Honeysuckle Road, Spartanburg, South Carolina 29303. She developed invasive lobular breast cancer after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin, and Amen.

41. In or around January 23, 1989, HAZEL BURGESS, plaintiff, was prescribed and began to take the HRT drugs Premarin and Amen.

42. On or around May 20, 1996, HAZEL BURGESS, plaintiff, was prescribed and began to take HRT medication.

43. HAZEL BURGESS, the Plaintiff, developed invasive lobular breast cancer after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin, and the MPA Amen.

44. Plaintiff JOYCE BURPEE is an individual who is a citizen of Washington and resides at 3738 Pennsylvania St, Longview, WA 98632. She developed invasive ductal breast cancer after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

45. In or around 1987, JOYCE BURPEE, plaintiff, was prescribed and began to take the HRT drugs Premarin and Provera.

46. On or around October 1998, JOYCE BURPEE, plaintiff, ceased taken HRT drugs after being diagnosed with invasive ductal breast cancer.

47. Plaintiff VIRGINIA CAMPBELL is an individual who is a citizen of the State of Ohio and resides at 812 Carnation Drive, Wapakoneta, OH 45895. She developed invasive lobular breast cancer after taking the Hormone Replacement Therapy ("HRT") drug Prempro.

48. In or around 1995, Plaintiff, Virginia Campbell, was prescribed and began to take Prempro.

49. In early 2000, Plaintiff, VIRGINIA CAMPBELL, was diagnosed with invasive lobular carcinoma. She had a mastectomy performed to combat the cancer.

50. Plaintiff ADRIANNE CARRERA is an individual who is a citizen of Florida and resides in Aventura, FL. She developed invasive and in situ ductal breast cancer that was

progesterone and estrogen hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

51. In 1988, ADRIANNE CARRERA, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

52. On or around September 16, 1994, ADRIANNE CARRERA, plaintiff, ceased taking the HRT drugs after being diagnosed with invasive and in situ ductal breast cancer in her left breast. In 1998, she was diagnosed with invasive and in situ ductal breast cancer in the right breast.

53. Plaintiff LOIS CARTER is an individual who is a citizen of Illinois and resides in Medinah, IL. She developed invasive lobular and invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

54. Around 1987, LOIS CARTER, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

55. Around March 29, 1995, LOIS CARTER, plaintiff was diagnosed with invasive lobular and invasive ductal breast cancer.

56. Plaintiff MARGARET CHAMNESS is an individual who is a citizen of California and resides at 212 Armona Avenue, Avenal, California 93204. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

57. By April 1998, MARGARET CHAMNESS, Plaintiff, had been prescribed and was taking the HRT drugs Premarin and Provera.

58. Around August of 2000, MARGARET CHAMNESS, plaintiff, switched from

Premarin and Provera to the single HRT pill Prempro.

59. In October of 2001, MARGARET CHAMNESS, plaintiff, ceased all HRT drugs and was diagnosed with invasive ductal breast cancer that was estrogen and progesterone hormone positive.

60. Plaintiff MARY CHRISCO is an individual who is a citizen of California and resides in Modesto, CA. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

61. On or around September 16, 1993, MARY CHRISCO, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

62. On or around June 30, 1997, MARY CHRISCO, plaintiff, switched from taking the HRT drugs Premarin and Provera to the single pill Prempro.

63. Sometime after July 17, 2000, MARY CHRISCO, plaintiff ceased taking the HRT drug Prempro. On or around October 3, 2000, she was diagnosed with invasive ductal breast cancer.

64. Plaintiff PEGGY CLEMONS is an individual who resides at 57 Rendezvous Drive, New Concord, Kentucky. She developed invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

65. In 1994, PEGGY CLEMONS, the Plaintiff, was prescribed and began taking the combination HRT drugs Premarin and Provera.

66. In October of 1999, PEGGY CLEMONS halted her HRT when she was diagnosed with invasive ductal breast cancer. PEGGY CLEMONS had a mastectomy to treat the breast

cancer.

67. Plaintiff SALLY COLLINS is an individual who is a citizen of Wisconsin and resides at 2254 8th Avenue, Chetek, WI 54728. She developed in situ ductal breast cancer that was both progesterone and estrogen hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

68. By 1980, SALLY COLLINS, plaintiff, had been prescribed and was taking the HRT drugs Premarin and Provera.

69. On or around April 9, 1993, SALLY COLLINS, plaintiff, ceased taking the HRT drugs after she was diagnosed with in situ ductal breast cancer.

70. Plaintiff BARBARA COUCH is an individual who is a citizen of South Carolina and resides at 709 Canterbury Drive, Lancaster, SC 29720. She developed invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

71. In 1992, Plaintiff, BARBARA COUCH, was prescribed and began to take the HRT drugs Premarin and Provera.

72. In 1997, BARBARA COUCH ceased taken the HRT drugs when she was diagnosed with invasive ductal breast cancer. She underwent a mastectomy to combat the breast cancer.

73. Plaintiff MARY DAWSON is an individual who is a citizen of California and resides at 1238 Maryland Avenue, Los Banos, CA 93635. She developed invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premphase, Premarin and Provera.

74. By April 1990, MARY DAWSON, plaintiff, had been prescribed and was taking the HRT drugs Premarin and Provera.

75. In or around April 1998, MARY DAWSON, plaintiff, switched from the HRT drugs Premarin and Provera to the single pill HRT Premphase.

76. In or around July 1999, MARY DAWSON, plaintiff, was diagnosed with invasive ductal breast cancer that was estrogen and progesterone hormone positive. She ceased taking the HRT drug Premphase.

77. Plaintiff LOIS DUFFY is an individual who is a citizen of California and resides in Del Mar, CA. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drug Prempro.

78. By April 9, 1996, LOIS DUFFY, plaintiff, was prescribed and began taking the HRT drug Prempro.

79. On or around February 8, 2001, LOIS DUFFY, plaintiff, was diagnosed with invasive ductal breast cancer.

80. Plaintiff LINDA EELLS is an individual who is a citizen of California and resides in San Jose, CA. She developed in situ ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

81. By November 2, 1998, LINDA EELLS, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

82. On or around May 5, 2003, LINDA EELLS, plaintiff, was diagnosed with in situ ductal breast cancer.

83. Plaintiff RACHEL EPSTEIN is an individual who is a citizen of New York and resides in Roslyn, NY. She developed invasive lobular breast cancer that was estrogen and

progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

84. In 1983, RACHEL EPSTEIN, plaintiff, was prescribed and began to take the HRT drugs Premarin and Provera.

85. In 1996, RACHEL EPSTEIN, Plaintiff, switched from the dual pills Premarin and Provera to the single pill Prempro.

86. In 2000, RACHEL EPSTEIN, Plaintiff, was diagnosed with invasive lobular breast cancer.

87. Plaintiff FRANCES FARR is an individual who is a citizen of Texas and resides in Pottsboro, TX. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

88. By January 23, 1995, FRANCES FARR, plaintiff was prescribed and began taking the HRT drugs Premarin and Provera.

89. By December 12, 1997, FRANCES FARR, plaintiff, switched from the dual HRT pills Premarin and Provera to the single HRT pill Prempro.

90. Around July 20, 2000, FRANCES FARR, plaintiff, was diagnosed with invasive ductal breast cancer.

91. Plaintiff MARJORIE FLAMAN is an individual who is a citizen of Oregon and resides in Portland, OR. She developed invasive and in situ ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

92. By November 9, 1992, MARJORIE FLAMAN, plaintiff, was prescribed and began to

take the HRT drugs Premarin and Provera.

93. On or around February 25, 1998, MARJORIE FLAMAN, plaintiff, was diagnosed with invasive and in situ ductal breast cancer.

94. Plaintiff MARGARET FOLTZ is an individual who is a citizen of Ohio and resides in Lancaster, OH. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

95. By March of 1989, MARGARET FOLTZ, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera..

96. By May 28, 1996, MARGARET FOLTZ, Plaintiff, switched from the dual HRT drugs Premarin and Provera to the single pill HRT drug Prempro.

97. Around November of 1996, MARGARET FOLTZ, Plaintiff, was diagnosed with invasive ductal breast cancer.

98. Plaintiff WANDA FOLTZ is an individual who is a citizen of Texas and resides at 9425 Goldenrod Lane, Garden Ridge, TX 78266. She developed invasive lobular breast cancer taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

99. In or around August 29, 1986, WANDA FOLTZ, plaintiff, was prescribed and began to take the HRT drugs Premarin and Nordulate. In or around December 12, 1986, she switched from Nordulate to Provera until in or around May 29, 1987. She used Nordulate with the Premarin until in or around April 14, 1989, when she switched back to Provera with the Premarin and continued to use this form of HRT therapy until on or about June 1996.

100. In or around June 1996, WANDA FOLTZ, plaintiff, ceased taking the HRT drugs when she was diagnosed with invasive lobular breast cancer.

101. Plaintiff DELOIS FOSTER is an individual who is a citizen of California and resides in Hemet, CA. She developed invasive ductal breast cancer that was progesterone and estrogen hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

102. By May 15, 1989, DELOIS FOSTER, plaintiff, was prescribed and was taking the HRT drugs Premarin and Provera.

103. In March of 1996, DELOIS FOSTER, plaintiff, was diagnosed with invasive ductal breast cancer. She ceased taking the HRT drugs.

104. Plaintiff JO GARRISON O'NEIL is an individual who is a citizen of North Caroline and resides in Waynesville, NC. She developed in situ ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

105. By June 29, 1989, JO GARRISON O'NEIL, Plaintiff, had been prescribed and was taking the HRT drugs Premarin and Provera.

106. Around September 14, 1996, JO GARRISON O'NEIL, plaintiff, was diagnosed with in situ ductal breast cancer.

107. Plaintiff SHARON HAEMKER is an individual who is a citizen of Illinois and resides in Steger, IL. She developed invasive and in situ ductal breast cancer that was progesterone and estrogen hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

108. By August 22, 1986, SHARON HAEMKER, plaintiff, was prescribed and was taking the HRT drugs Premarin and Provera.

109. In November of 1999, SHARON HAEMKER, plaintiff, was diagnosed with invasive

and in situ ductal breast cancer. She ceased taking the HRT drugs

110. Plaintiff MARGARET HARRIS is an individual who is a citizen of Ohio and resides in Wellington, OH. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drug Prempro.

111. By April 5, 1996, MARGARET HARRIS, Plaintiff, was prescribed and began taking the HRT drug Prempro.

112. In June 2000, MARGARET HARRIS, plaintiff, was diagnosed with invasive ductal breast cancer.

113. Plaintiff LOUISE HESS is an individual who is a citizen of West Virginia and resides in Mullens, WV. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drug Prempro.

114. Around September 15, 1995, LOUISE HESS, plaintiff, was prescribed and began taking the HRT drug Prempro.

115. Around August 15, 2000, LOUISE HESS, plaintiff, was diagnosed with invasive ductal breast cancer.

116. Plaintiff WANDA HINCEMAN is an individual who is a citizen of North Carolina and resides in Salisbury, NC. She developed invasive lobular and ductal breast cancer after taking the Hormone Replacement Therapy ("HRT") drug Prempro.

117. By February 12, 1996, WANDA HINCEMAN, plaintiff, was prescribed and began to take the HRT drug Prempro.

118. In April of 2000, WANDA HINCEMAN, plaintiff, ceased taking the HRT drug

Prempro when she was diagnosed with invasive lobular and ductal breast cancer.

119. Plaintiff MARGUERITE HJALMARSON is an individual who is a citizen of New York and resides in Williamsville, NY. She developed invasive ductal breast cancer after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

120. In or around November 1988 plaintiff HJALMARSON was prescribed and began to take the HRT drugs Premarin and Provera. In or around November 1996 plaintiff ceased taking HRT drugs.

121. On or around January 21, 1997, plaintiff HJALMARSON was diagnosed with invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive.

122. Plaintiff ALICE HOLTZMAN is an individual who is a citizen of Florida and resides in Weston, FL. She developed invasive ductal breast cancer that was estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

123. By April 3, 1989, ALICE HOLTZMAN, plaintiff, had been prescribed and began taking the HRT drugs Premarin and Provera.

124. In May of 1994, ALICE HOLTZMAN, Plaintiff, was diagnosed with Invasive Ductal Breast cancer.

125. Plaintiff RITA HREN is an individual who is a citizen of Florida and resides at 95 Douglas Street, Homosassa, Florida 34446-3806. She developed invasive ductal breast cancer that was both progesterone and estrogen hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

126. On or around April 21, 1992, RITA HREN, plaintiff, was prescribed and began to take the HRT drugs Premarin and Provera.

127. On or around March 30, 1996, RITA HREN, plaintiff, switched from the HRT drugs Premarin and Provera to the singles pill HRT drug Prempro.

128. On or around April 26, 2000, RITA HREN, plaintiff, ceased taking HRT drugs after being diagnosed with invasive ductal breast cancer.

129. Plaintiff NANCY HUNTER is an individual who is a citizen of Tennessee and resides in Loudon, TN. She developed invasive lobular and invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

130. By May 6, 1988, NANCY HUNTER, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

131. Around April 7, 1998, NANCY HUNTER, plaintiff, was diagnosed with invasive lobular and invasive ductal breast cancer.

132. Plaintiff YVONNE HUTCHINSON is an individual who is a citizen of Ohio and resides in Toledo, OH. She developed invasive ductal breast cancer that was progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

133. On or around November 6, 1995, YVONNE HUTCHINSON was prescribed and began to take the HRT drugs Premarin and Provera.

134. In or around November 19, 1999, YVONNE HUTCHINSON, plaintiff, ceased taking the HRT drugs when she was diagnosed with invasive ductal breast cancer.

135. Plaintiff GLENDA IVEY is an individual who is a citizen of Alabama and resides in Haleyville, AL. She developed invasive lobular breast cancer after taking the Hormone Replacement Therapy ("HRT") drugs Prempro, Premarin and Provera.

136. On or around April 26, 1988, GLENDA IVEY, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

137. On or around January 29, 1997, GLENDA IVEY, plaintiff, switched from taking the HRT drugs Premarin and Provera to the single pill Prempro.

138. On or around December 8, 1997, GLENDA IVEY, plaintiff, ceased taking the HRT drugs when she was diagnosed with invasive lobular breast cancer.

139. Plaintiff DORIS JEROME is an individual who is a citizen of California and resides in Sacramento, CA. She developed invasive ductal breast cancer that was both estrogen and progesterone hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

140. By February 10, 1994, DORIS JEROME, plaintiff, was prescribed and began taking the HRT drugs Premarin and Provera.

141. Around August 3, 1998, DORIS JEROME, Plaintiff, was diagnosed with invasive ductal breast cancer.

142. Plaintiff GRACE KIGER is an individual who is a citizen of North Carolina and resides in Clemmons, NC. She developed invasive ductal breast cancer that was progesterone and estrogen hormone receptor positive after taking the Hormone Replacement Therapy ("HRT") drugs Premarin and Provera.

143. In or around January 1996, GRACE KIGER, plaintiff, was prescribed and began taking Provera with the Premarin.

144. On or around May 2001, GRACE KIGER, plaintiff, ceased taken the HRT drugs after being diagnosed with invasive ductal breast cancer.

145. Plaintiff PATSY ANDERSON is an individual who is a citizen of California and

resides in Eureka, California. At all relevant time, plaintiff was a resident of the state of California. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

146. Plaintiff, PATSY ANDERSON, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin and MPAs such as Provera.

147. Plaintiff PATSY ANDERSON began taking hormone replacement therapy in 1977 and discontinued that therapy when she was diagnosed with breast cancer in 2005. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Anderson took Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

148. Plaintiff JUANITA BROUWER is an individual who is a citizen of Maryland and resides in Nottingham, Maryland. At all relevant time, plaintiff was a resident of the state of Maryland. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

149. Plaintiff, JUANITA BROUWER, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Prempro, Premarin and MPAs such as Provera.

150. Plaintiff JUANITA BROUWER began taking hormone replacement therapy in 1988 and discontinued that therapy when she was diagnosed with breast cancer in 1998. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal and lobular cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Brouwer took Prempro (manufactured by Wyeth), Premarin (manufactured by Wyeth), and Provera

(manufactured by Pfizer).

151. 1. Plaintiff NATA CARGAN is an individual who is a citizen of Massachusetts, and resides in Dracut, Massachusetts. At all relevant time, plaintiff was a resident of the state of Massachusetts. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

152. Plaintiff, NATA CARGAN, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drug Prempro.

153. Plaintiff NATA CARGAN began taking hormone replacement therapy in 1997 and discontinued that therapy when she was diagnosed with breast cancer in 2003. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Cargan took Prempro (manufactured by Wyeth).

154. Plaintiff NANCY JO CARTER is an individual who is a citizen of Illinois and resides in Flatrock, Illinois. At all relevant time, plaintiff was a resident of the state of Illinois. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

155. Plaintiff, NANCY JO CARTER, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs, Premarin and MPAs such as Provera.

156. Plaintiff NANCY JO CARTER began taking hormone replacement therapy in 1990 and discontinued that therapy when she was diagnosed with breast cancer in 1997. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Carter took Premarin

(manufactured by Wyeth), and Provera (manufactured by Pfizer).

157. Plaintiff JAN COSTA RYDJESKE is an individual who is a citizen of California and resides in Tuolumne, California. At all relevant time, plaintiff was a resident of the state of California. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

158. Plaintiff, JAN COSTA RYDJESKE, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin and MPAs such as Provera.

159. Plaintiff JAN COSTA RYDJESKE began taking hormone replacement therapy in 1987 and discontinued that therapy when she was diagnosed with breast cancer in 1994. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Rydjeske took Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

160. Plaintiff WILMA COWART is an individual who is a citizen of Louisiana and resides in West Monroe, Louisiana. At all relevant time, plaintiff was a resident of the state of Louisiana. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

161. Plaintiff, WILMA COWART, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin and MPAs such as Provera.

162. Plaintiff WILMA COWART began taking hormone replacement therapy in 1987 and discontinued that therapy when she was diagnosed with breast cancer in 1999. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with both estrogen and

progesterone receptors positive. During her years of consumption, Ms. Cowart took Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

163. Plaintiff PATRICIA FERNAU is an individual who is a citizen of Utah and resides in Tooele, Utah. At all relevant time, plaintiff was a resident of the state of Utah. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

164. Plaintiff, PATRICIA FERNAU, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin and MPAs such as Provera.

165. Plaintiff PATRICIA FERNAU began taking hormone replacement therapy in 1983 and discontinued that therapy when she was diagnosed with breast cancer in 1996. During her years of consumption, Ms. Fernau took Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

166. Plaintiff ISABEL FRAGOSO is an individual who is a citizen of California, and resides in Stockton, California. At all relevant time, plaintiff was a resident of the state of California. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

167. Plaintiff, ISABEL FRAGOSO, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drug Prempro.

168. Plaintiff ISABEL FRAGOSO began taking hormone replacement therapy in 1996 and discontinued that therapy when she was diagnosed with breast cancer in 2002. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with progesterone receptors positive. During her years of consumption, Ms. Fragoso took Prempro (manufactured by

Wyeth).

169. Plaintiff DORIS GIST is an individual who is a citizen of Mississippi and resides in Luka, Mississippi. At all relevant time, plaintiff was a resident of the state of Mississippi. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

170. Plaintiff, DORIS GIST, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drug Prempro, Premarin and MPAs such as Provera.

171. Plaintiff DORIS GIST began taking hormone replacement therapy in 1995 and discontinued that therapy when she was diagnosed with breast cancer in 1999. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Gist took Prempro (manufactured by Wyeth), Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

172. Plaintiff HELEN PENNY AROS is an individual who is a citizen of California and resides in Garden Grove, California. At all relevant time, plaintiff was a resident of the state of California. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

173. Plaintiff, HELEN PENNY AROS, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin and MPAs such as Provera.

174. Plaintiff HELEN PENNY AROS began taking hormone replacement therapy in 1985 and discontinued that therapy when she was diagnosed with breast cancer in 1999. A biopsy of

her cancer was confirmed by pathology to be ductal cancer. During her years of consumption, Ms. Aros took Premarin (manufactured by Wyeth), Provera (manufactured by Pfizer) and MedroxyProgesterone (manufactured by Barr).

175. Plaintiff PATRICIA BRUNNER is an individual who is a citizen of New Jersey and resides in Blairstown, New Jersey. At all relevant time, plaintiff was a resident of the state of New Jersey. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

176. Plaintiff, PATRICIA BRUNNER, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Prempro, Premarin and MPAs such as Provera.

177. Plaintiff PATRICIA BRUNNER began taking hormone replacement therapy in 1990 and discontinued that therapy when she was diagnosed with breast cancer in 1998. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal and lobular cancer. During her years of consumption, Ms. Brunner took Prempro (manufactured by Wyeth), Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

178. Plaintiff JOAN CASTO is an individual who is a citizen of California and resides in Foster City, California. At all relevant time, plaintiff was a resident of the state of California. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

179. Plaintiff, JOAN CASTO, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin, Ogen, Aygestin and MPAs such as Provera.

180. Plaintiff JOAN CASTO began taking hormone replacement therapy in 1980 and discontinued that therapy when she was diagnosed with breast cancer in 1996. A biopsy of her cancer was confirmed by pathology to be infiltrating lobular cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Casto took Premarin (manufactured by Wyeth), Aygestin (manufactured by Wyeth), Ogen (manufactured by Pfizer), and Provera (manufactured by Pfizer).

181. Plaintiff MARIAN CONNER is an individual who is a citizen of West Virginia and resides in Morgantown, West Virginia. At all relevant time, plaintiff was a resident of the state of West Virginia. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

182. Plaintiff, MARIAN CONNER, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin, Aygestin and MPAs such as Provera.

183. Plaintiff MARIAN CONNER began taking hormone replacement therapy in 1983 and discontinued that therapy when she was diagnosed with breast cancer in 1995. A biopsy of her cancer was confirmed by pathology to be invasive ductal cancer with both estrogen receptors positive. During her years of consumption, Ms. CONNER took Premarin and Aygestin (manufactured by Wyeth), Provera (manufactured by Pfizer) and MedroxyProgesterone (manufactured by Pfizer and Barr).

184. Plaintiff JANET EDWARDS is an individual who is a citizen of Wisconsin and resides in Jamesville, Wisconsin. At all relevant time, plaintiff was a resident of the state of Wisconsin. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

185. Plaintiff, JANET EDWARDS, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin and MPAs such as Provera.

186. Plaintiff JANET EDWARDS began taking hormone replacement therapy in 1992 and discontinued that therapy when she was diagnosed with breast cancer in 1996. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Edwards took Premarin (manufactured by Wyeth) and Provera (manufactured by Pfizer).

187. Plaintiff WILMA FAULKNER is an individual who is a citizen of Texas and resides in Corsicana, Texas. At all relevant time, plaintiff was a resident of the state of Texas. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

188. Plaintiff, WILMA FAULKNER, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Prempro, Premarin and MPAs such as Provera.

189. Plaintiff WILMA FAULKNER began taking hormone replacement therapy in 1978 and discontinued that therapy when she was diagnosed with breast cancer in 1999. A biopsy of her cancer was confirmed by pathology to be infiltrating ductal cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Faulkner took Prempro (manufactured by Wyeth), Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

190. Plaintiff NANCY KATTE is an individual who is a citizen of Arizona and resides in Tucson, Arizona. At all relevant time, plaintiff was a resident of the state of Arizona. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

191. Plaintiff, NANCY KATTE, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Premarin and MPAs such as Provera.

192. Plaintiff NANCY KATTE began taking hormone replacement therapy in 1982 and discontinued that therapy when she was diagnosed with breast cancer in 2000. A biopsy of her cancer was confirmed by pathology to be infiltrating lobular cancer. During her years of consumption, Ms. Katte took Premarin (manufactured by Wyeth), and Provera (manufactured by Pfizer).

193. Plaintiff NAN MAURY is an individual who is a citizen of New Hampshire and resides in Portsmouth. At all relevant time, plaintiff was a resident of the state of New Hampshire. Plaintiff is an individual consumer of hormone replacement therapy drugs and was injured as a result.

194. Plaintiff, NAN MAURY, brings this action to recover damages for personal injuries against the Defendants for their design, promotion, manufacturing, labeling, distribution and sale of the HRT drugs Estrogen, Estrace and MPAs such as Provera.

195. Plaintiff NAN MAURY began taking hormone replacement therapy in 1989 and discontinued that therapy when she was diagnosed with breast cancer in 2000. A biopsy of her cancer was confirmed by pathology to be invasive ductal cancer with both estrogen and progesterone receptors positive. During her years of consumption, Ms. Maury took generic estrogen (manufactured by Wyeth), Estrace (manufactured by Mead Johnson) and Provera (manufactured by Pfizer).

196. Each Plaintiff developed breast cancer after taking hormone replacement therapy drugs manufactured, marketed and sold by Defendants. As a result, each Plaintiff required

extensive medical treatment and has suffered in the past and/or will likely suffer in the future, medical testing, breast biopsies, invasive exploratory surgeries, removal of breast tissue, lumpectomy or mastectomy surgeries, disfigurement, reconstruction surgeries, chemotherapy, radiation, chemical treatments, long-term cancer treatment using anti-estrogen or estrogen blocking drugs, continuing medical monitoring, physical and emotional pain, physical and emotional suffering, mental anguish (including but not limited to the reasonable fear of additional injury), physical impairment, disfigurement, extreme embarrassment, medical bills and expenses, as well as loss of wages and wage earning capacity. The cancer and subsequent surgery, treatment, injury, and damages to Plaintiffs were caused by use of the aforementioned drugs.

197. Defendant, WYETH, and its divisions, WYETH PHARMACEUTICALS and ESI LEDERLE (hereinafter "WYETH") is a Delaware Corporation with its headquarters in Madison, New Jersey and its principal place of business in Pennsylvania. WYETH regularly conducted, and continues to conduct, its pharmaceutical distribution and sales business within the United States, the State of Minnesota, and within the geographic jurisdiction of this court. At all relevant times, WYETH was engaged in the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products, including hormone replacement therapy medications such as HRT drugs, including generic estrogen, generic MPA, Prempro, Premarin, Cycrin, Aygestin and Premphase for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in various foreign jurisdictions.

198. Defendant, PFIZER INC., is a Delaware corporation with a principal place of business in New York. Upon information and belief, a merger exists between PFIZER INC., and

PHARMACIA & UPJOHN COMPANY LLC, PHARMACIA & UPJOHN LLC and PHARMACIA CORPORATION and as a result, PFIZER INC., is legally and factually responsible for all obligations, debts, and liabilities of the three entities. PFIZER INC., is the successor in interest and real party to all three entities. PFIZER INC., wholly owns PHARMACIA CORPORATION, which is the sole member of the limited liability company PHARMACIA & UPJOHN LLC, whish is the sole member of the limited liability company PHARMACIA & UPJON COMPANY LLC. The term "PFIZER", when used herein, refers to PFIZER, INC. and each these three related companies. At all times relevant hereto, PFIZER was engaged in, inter alia, the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products, including hormone replacement therapy medications such as Hormone Replacement Therapy ("HRT") drugs, including Provera and Ogen, generic estrogen (including but not limited to FemHrt and Vagifem), medroxyprogesterone acetate ("MPA"), and combination products (including Activella) for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in foreign jurisdictions.

199. Defendant, PHARMACIA & UPJOHN COMPANY LLC is a limited liability company whose sole member is PHARMACIA & UPJOHN LLC, whish is a limited liability company whose sole members is PHARMACIA CORPORATION, which is a subsidiary of PFIZER, INC. PHARMACIA & UPJOHN COMPANY LLC is a Delaware Corporation with its principal place of business in New York. At all times relevant hereto, PHARMACIA & UPJOHN COMPANY LLC was engaged in the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products, including hormone replacement therapy

medications such as Hormone Replacement Therapy ("HRT") drugs, including Provera, generic estrogen (including but not limited to FemHrt and Vagifem), medroxyprogesterone acetate ("MPA"), and combination products (including Activella) for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in foreign jurisdictions.

200. Defendant, PHARMACIA & UPJOHN LLC, is a limited liability company whose sole member is PHARMACIA CORPORATION , which is a subsidiary of PFIZER, INC. PHARMACIA & UPJOHN LLC is the sole member of the limited liability company PHARMACIA & UPJOHN COMPANY LLC. PHARMACIA & UPJOHN LLC is a Delaware company with its principal place of business in New York. At all times relevant hereto, PHARMACIA & UPJOHN LLC was engaged in the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products, including hormone replacement therapy medications such as Hormone Replacement Therapy ("HRT") drugs, including Provera, generic estrogen (including but not limited to FemHrt and Vagifem), medroxyprogesterone acetate ("MPA"), and combination products (including Activella) for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in foreign jurisdictions.

201. Defendant, PHARMACIA CORPORATION, doing business in Minnesota as PHARMACIA PHARMACEUTICAL CORPORATION, is a wholly owned subsidiary of PFIZER, INC, and is the sole member of the limited liability company PHARMACIA & UPJOHN LLC, which is the sole member of the limited liability company PHARMACIA & UPJOHN COMPANY LLC. PHARMACIA CORPORATION is a New York corporation with it

principal place of business in the state of New York. At all times relevant hereto, PHARMACIA CORPORATION was engaged in the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products, including hormone replacement therapy medications such as Hormone Replacement Therapy ("HRT") drugs, including Provera, generic estrogen (including but not limited to FemHrt and Vagifem), medroxyprogesterone acetate ("MPA"), and combination products (including Activella) for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in foreign jurisdictions.

202. Defendant, BARR LABORATORIES, INC., a Delaware corporation, regularly conducted, and continues to conduct, its pharmaceutical distribution and sales business within the United States, the State of Minnesota, and within the geographic jurisdiction of this court. At all relevant times, BARR was engaged in the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products and hormone replacement therapy medications including but not limited to the HRT drugs, Cenestin and MedroxyProgesterone, for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in various foreign jurisdictions.

203. Defendant MEAD JOHNSON & COMPANY, a Delaware corporation, regularly conducted, and continues to conduct, its pharmaceutical distribution and sales business within the United States, the State of Minnesota, and within the geographic jurisdiction of this court. At all relevant times, MEAD JOHNSON was engaged in the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products and hormone replacement therapy medications

including but not limited to the HRT drugs, Estrace, Estradiol and Estring for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in various foreign jurisdictions.

204. Defendant, GREENSTONE, LTD., a Delaware corporation, regularly conducted, and continues to conduct, its pharmaceutical distribution and sales business within the United States, the State of Minnesota, and within the geographic jurisdiction of this court. At all relevant times, GREENSTONE was engaged in the business of designing, manufacturing, producing, testing, studying, researching, labeling, marketing, advertising, selling, promoting and/or distributing pharmaceutical products and hormone replacement therapy medications including but not limited to the HRT drug, MedroxyProgesterone, for ultimate sale and/or use in the United States of America, including but not limited to the State of Minnesota, as well as in various foreign jurisdictions.

205. Plaintiff is ignorant to the true names and capacities of the defendants sued in this complaint as DOES 1 through 10 and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes, and on that basis alleges, that each of the defendants designated as "DOE" is legally responsible in some manner for the events and happenings herein alleged, and that Plaintiff's damages as alleged herein were proximately caused by such defendants.

206. At all times relevant hereto, Defendants were in the business of researching, designing, formulating, compounding, testing, manufacturing, producing, processing, assembling, inspecting, distributing, marketing, labeling, promoting, packaging and/or advertising the hormone replacement therapy pharmaceutical products, including but not limited

to Premarin, Provera, MPA, Prempro, and others named and unnamed herein. Plaintiffs allege that Defendants transact business in the State of Minnesota and, at all times relevant herein, researched, designed, formulated, compounded, tested, manufactured, produced, processed, assembled, inspected, distributed, marketed, labeled, promoted, packaged, and/or advertised the pharmaceutical products Premarin, Provera, MPA, Prempro, and other named and unnamed hormone replacement therapy drugs, in interstate commerce and in the State of Minnesota.

II. FACTUAL BACKGROUND

A. The Marketing of Hormone Therapy

207. Menopause is the cessation of menstruation caused by declining levels of estrogen and progesterone. It is a natural human phenomenon-- a phase of the female reproductive aging process-- and is not a disease. Symptoms, which vary in severity from woman to woman, may include hot flashes, chills, vaginal dryness, headache and irritability. Adverse consequences of the drop in estrogen levels which begin with menopause and continue after menopause include, *inter alia*, vaginal atrophy and dryness; an increase in LDL cholesterol levels; and, a decrease in bone density with resultant increased risk of osteoporosis.

208. These symptoms and consequences of menopause have been described in scientific literature since the late 1800s, and by the turn of the 20th century the search for an aid to alleviate them was widely pursued.

209. In 1942, Ayerst, the predecessor to Wyeth, received patent and FDA approval for Premarin, a mix of estrogens extracted from the urine of pregnant mares. Premarin was marketed to women and their physicians as the long sought after replacement for lost estrogen in menopausal women, and was referred to as "Replacement" estrogen therapy.

210. The FDA originally approved Premarin only to relieve menopausal symptoms, such